

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

BLAKE BEELER, et al.,

Plaintiffs,

v.

JONATHAN SKRMETTI, et al.,

Defendants.

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No. 3:21-cv-152

Judge Katherine A. Crytzer

Magistrate Judge Debra C. Poplin

**JOINT MOTION TO STAY CASE FOR 60 DAYS PENDING SUBMISSION OF AGREED
ORDER OF JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 6 and this Court's Order extending the deadline for Defendants¹ to respond to Plaintiffs' First Amended Complaint (D.E. 35), the Parties respectfully request that this Court enter an order staying all proceedings for a period of 60 days, up and until January 13, 2022, to allow the parties to negotiate and finalize the submission of an agreed order of judgment resolving all issues before the Court.

On October 28, 2022, the Court ordered that Defendants shall have until November 14, 2022, to respond to Plaintiffs' First Amended Complaint and that no further extensions would be granted absent extraordinary circumstances. (D.E. 35.) The Parties respectfully submit that extraordinary circumstances exist to justify a temporary stay of proceedings.

Specifically, since filing of the First Amended Complaint, and since the Court entered its previous order, the Parties have conferred and have agreed on a path to resolution of the case that involves the submission of an agreed order of judgment that would resolve the case in its entirety.

¹ Jonathan Skrmetti, Attorney General & Reporter for the State of Tennessee, has been dismissed as a Defendant. (D.E. 36.)

The Parties anticipate finalizing their agreement in the coming weeks and require additional time to negotiate and draft terms for this Court's approval.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically and served through the electronic filing system on this 14th day of November 2022, upon the following:

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